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9 *Attorneys for Plaintiff*

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12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 ZUMA PRESS, INC.,

16 Case No.: 4:23-cv-03854-JST

17 Plaintiff,

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19 **STIPULATED REQUEST AND**
20 **[PROPOSED] ORDER TO STAY**
21 **ALL CASE-RELATED**
22 **DEADLINES PENDING**
23 **SETTLEMENT**

24 v.
25 PLEX, INC.,

26 Judge: Hon. Jon S. Tigar

27 Defendant.

1 Pursuant to Civil Local Rule 6-2(a), Plaintiff Zuma Press, Inc. (“Plaintiff”) and
2 Defendant PLEX, Inc. (“Defendant”) (collectively with Plaintiff, the “Parties”) make
3 the following stipulated request:

4 WHEREAS, on August 1, 2023, Plaintiff filed a Complaint and Demand for Jury
5 Trial [Dkt. No. 1];

6 WHEREAS, Defendant was served with the summons and complaint on August
7 3, 2023;

8 WHEREAS, the Parties filed a Stipulation to Extend Time for Defendant to
9 Respond to Complaint on August 23, 2023, extending Defendant’s time to respond to
10 Plaintiff’s complaint to October 9, 2023;

11 WHEREAS, this action was reassigned to the Honorable Jon S. Tigar on
12 September 13, 2023, and all previous hearing dates were vacated and rescheduled;

13 WHEREAS, the Parties filed a second Stipulation to Extend Time for Defendant
14 to Respond to Complaint on October 6, 2023, extending Defendant’s time to respond
15 to Plaintiff’s complaint to October 23, 2023;

16 WHEREAS, the Parties filed a third Stipulation to Extend Time for Defendant to
17 Respond to Complaint on October 23, 2023;

18 WHEREAS, the current deadline for Defendant to respond to Plaintiff’s
19 complaint is November 20, 2023;

20 WHEREAS, the Parties are finalizing the terms of a settlement;

21 WHEREAS, the initial case management conference is currently scheduled for
22 October 31, 2023;

23 WHEREAS, the following dates and deadlines are associated with the initial case
24 management conference:

- 25 • 10/10/2023 – Last day to meet and confer re initial disclosures, early
26 settlement, ADR process selection and discovery plan; file ADR
27 certification form;

- 1 • 10/24/2023 - Joint Case Management Statement and Rule 26(f) Report
2 due.

3 WHEREAS, the Parties believe that staying all case-related deadlines at this time
4 to allow the Parties to formalize their settlement would promote judicial efficiency and
5 conserve the Parties and Court's resources;

6 WHEREAS, there have been no time modifications other than those listed above;
7 and

8 WHEREAS, staying all-case related deadlines would remove the date for the
9 initial case management conference and the other two deadlines associated with the
10 initial case management conference, but would not alter the date of any event or any
11 deadline already fixed by Court.

12 THEREFORE, the Parties respectfully request that:

- 13 1. All case-related deadlines be stayed pending an update from the Parties
14 regarding the status of settlement.

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1 IT IS SO STIPULATED AND REQUESTED.

2 DATED: October 24, 2023 SANDERS LAW GROUP

3 By:

4 /s/ Jacqueline Mandel
5 Jacqueline Mandel
jmandel@sanderslaw.group
6 SANDERS LAW GROUP
333 Earle Ovington Blvd., Suite 402
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7 Telephone; +1.516.203.7600

8 *Attorneys for Plaintiff*
Zuma Press, Inc.

9 DATED: October 24, 2023 BAKER BOTTS L.L.P.

10 By:

11 /s/ Karan Singh Dhadialla
12 Sarah J. Guske
sarah.guske@bakerbotts.com
13 Karan Singh Dhadialla
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14 BAKER BOTTS L.L.P.
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16 *Attorneys for Defendant*
PLEX, INC.

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19 **ATTESTATION**

20 Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of
21 this document has been obtained from each of the other signatories hereto.

22 Dated: October 24, 2023

23 Respectfully submitted,

24 /s/ Jacqueline Mandel
25 Jacqueline Mandel

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2 **PROPOSED ORDER**
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PURSUANT TO STIPULATION, IT IS ORDERED that all case-related
deadlines are stayed pending a status update from the Parties regarding settlement.

Date: _____

By: _____

HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE

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